

## **CC Docket No. 94-102 – E911 Interim Report**

Filed by: Elbert County Wireless, L.L.C.

□ David Walker

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Date: July 31, 2003

To: Marlene H. Dortch, Secretary  
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By Electronic Submission:

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## **TIER III CARRIER INTERIM REPORT**

### **CC Docket No. 94-102**

Elbert County Wireless, L.L.C. ("ECW") hereby submits its E911 Interim Report, pursuant to *Revision of the Commission's Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems, Phase II Compliance Deadlines for Non-Nationwide CMRS Carriers*, CC Docket No. 94-102, FCC 02-210, released July 26, 2002 (*Non-Nationwide Carrier E911 Order*), and *Public Notice*, DA 03-2113, released June 30, 2003.

#### **Carrier Identifying Information:**

**Carrier Name:** Elbert County Wireless, L.L.C. – FRN 0006-8010-05

**E911 Compliance Officer:** David Walker  
1562 Park Street, Unit E  
Castle Rock, CO 80104-3113

#### **E911 Implementation Information:**

In February 2003, FCC rules changed, and carriers were given the flexibility to pursue alternative business models. ECW has moved to an alternative business model, specifically, becoming a "carriers' carrier". Thus, ECW has no retail business, providing only wholesale service to other carriers. ECW THUS HAS NO SUBSCRIBERS AND WILL NOT HAVE ANY SUBSCRIBERS. Based on this premise, ECW hereby reports as follows:

- ☐ ECW has received no Phase I requests and no Phase II requests from PSAPs. ECW has obtained and installed all of the network equipment and software necessary to meet a PSAP Phase I request. However, ECW is dependent on a landline between the switch and the requesting PSAP for Phase I deployment, and will have to work with the local exchange carrier ("LEC") to have a landline installed. ECW's system operates in rural areas, and it can take a LEC as long as 12 or even 18 months to install a new landline in a rural area. Thus, there is a substantial possibility that a PSAP's request would remain outstanding longer than six months while ECW awaits the installation of a landline connection to a PSAP.
- ☐ ECW is employing a handset-based solution for incoming roamers. ECW is using TDMA technology supplied by Airbiquity. Airbiquity is based in the State of Washington.
- ☐ ECW intends to serve incoming roamers using a handset-based solution. As such, ECW has installed all of the necessary network equipment for Phase I E911 deployment. ECW anticipates a significant problem with its Phase II E911 deployment. Specifically, ECW elected to use a handset-based solution for its E911 deployment, because it was the only attainable solution, either technically or financially. Recently, the FCC ruled that Airbiquity, the only vendor of TDMA handset-based solutions, was not offering a Phase II-compliant

handset. Now, neither Airbiquity nor any other vendor will be supporting a handset-based TDMA solution

Moreover, ECW is unable to switch to a network-based solution, because it is technically impossible. For a network-based solution to function, a handset must be located within the reliable service area of at least three cell sites simultaneously, in order to triangulate the position of the handset. ECW operates only in less densely populated areas where the cell sites are spread far apart and there is little overlap between two cells and even less overlap among three cells. Only a minor portion of ECW's service area is potentially susceptible to triangulation techniques; the bulk of the service area is not susceptible to triangulation and ECW could never meet the accuracy levels set forth in Section 20.18 of the Commission's rules, *i.e.*, accuracy within 300 meters 95% of the time on a system-wide basis.

- ☐ ECW obtained ALI-capable handsets from Airbiquity prior to the October 1, 2002 deadline, such that they were available if requested. ECW did not encounter any problems in obtaining or negotiating agreements to obtain these ALI-capable handsets. ECW added no new subscribers after October 1, 2002. As previously discussed, following the rule change to allow licensees to operate entirely as a "carriers' carrier", ECW went to that business model and currently has no subscribers, but, rather, serves only the customers of other carriers. ECW will not have any future subscribers.
- ☐ ECW does not anticipate that full Phase II service will be available in its network until its TDMA infrastructure exhausts its useful life, which will be sometime after December 31, 2005. This is due to the reasons discussed above pertaining to the issues with the absence of any available Phase II TDMA handsets and the impossibility of employing a network-based solution, both of which are beyond ECW's control. ECW will be filing a request with the Commission for a permanent waiver of the Phase II requirements in the near future.
- ☐ With regard to meeting the ultimate implementation date of December 31, 2005, see above.